

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
: :
Ramona Renee Smack : No. 19-10396-ELF
Debtor :

ANSWER TO MOTION OF WILMINGTON SAVINGS FUND SOCIETY
FOR RELIEF FROM THE AUTOMATIC STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Admitted.
9. Admitted.
10. Admitted.
11. Admitted.
12. Admitted.
13. Admitted.
14. Admitted.
15. Admitted some payments were missed. Debtor can make a down payment of \$1,200.00 and asks for the chance to catch up the remaining arrears.

WHEREFORE Debtor respectfully requests this Honorable Court deny Movant's Motion for Relief.

/s/ David M. Offen
David M. Offen
Attorney for Debtor(s)

Dated: 12/16/19

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CERTIFICATE OF SERVICE

The following has been served by electronic mail:

Michael J. Shavel on behalf of Wilmington Savings Fund Society
mshavel@hillwallack.com

/s/ David M. Offen
David M. Offen
Attorney for Debtor

Dated: 12/16/19